

# RECEIVED

## RCRA LAND DISPOSAL RESTRICTION INSPECTION JUL 13 1988

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Facility: HUKILL CHEMICAL CORPORATION

U.S. EPA I.D. No.: CHD 001-926-740

Street: 7013 KRICK ROAD

City: BEDFORD State: OH Zip Code: 44146

Telephone: (216) 232-9400

Operator: HUKILL CHEMICAL CORPORATION

Street: SAME AS ABOVE

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: HUKILL CHEMICAL CORPORATION

Street: SAME AS ABOVE

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: DECEMBER 8 AND 9, 1987 Time: \_\_\_\_\_ Weather Conditions: TEMP. 40-50°F  
4:00-5:00 DEC. 8  
4:00-5:00 DEC. 9 CLOUDY/RAIN

Name

Affiliation

Telephone

Inspectors: KRIS L. CODER, EPA, 216-425-9171

PAUL W. ANDERSON, DEPA, 216-425-9171

Facility Representatives: ROBERT HUKILL, PRESIDENT

BOB LANG, PROCESS SUPERVISOR

	RCRA Status	F-Solvent	LDR Status California List
Generator	<u>X</u>	<u>X</u>	_____
Transporter	<u>X</u>	<u>X</u>	_____
Treater	_____	_____	_____
Storer	<u>X</u>	<u>X</u>	_____
Disposer	<u>X</u>	<u>X</u>	_____

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## INSPECTION SUMMARY





# RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<u>X (MISCL)</u>		<u>X</u>		<u>X</u>
2.	F002	<u>X (MISCL)</u>		<u>X</u>		<u>X</u>
3.	F003	<u>X (MISCL)</u>		<u>X</u>		<u>X</u>
4.	F004	<u>X</u>		<u>X</u>		<u>X</u>
5.	F005	<u>X (MISCL)</u>		<u>X</u>		<u>X</u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

*BLENDED AS A HAZARDOUS WASTE FUEL*

## B. California List Wastes

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen:	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					



2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

<u>X</u>	_____	<u>X</u>	_____	<u>X</u>
----------	-------	----------	-------	----------

(ALSO  
USE  
COMMON  
CARRIER)

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

\_\_\_\_\_

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☒ Wastewaters containing solvents (less than or equal to 1% TOC by weight) *BY LAB ANALYSES - HAVE ABILITY TO <sup>A</sup> TREAT ON WATER*  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes *THROUGH ANALYSES*

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes      ☐ No      ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes    ☐ No    ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes    ☐ No

If yes, note how this is adequate: THROUGH ANALYSIS AND  
EC ANALYSIS

- TCLP

☐ Yes    ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes    ☐ No    ☐ NA

If yes, specify the waste stream: GENERIC WASH SOLVENT  
HAZARDOUS WASTE FUEL

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes    ☒ No    ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

SOLVENT EXTRACTION AND TESTING OF THE  
SOLVENTS

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes    ☐ No    ☒ NA





- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☒ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

- ☐ Liquid hazardous waste having a pH less than or equal to 2
- ☐ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- ☐ Liquid hazardous waste containing metals
- ☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☒ Yes ☐ No ☐ NA

If yes, note how this is adequate: SPENT ACID

- Testing

☒ Yes ☐ No ☐ NA

If yes, list test method used:

INITIAL TESTING (HF CENTER + NORMALIST)  
ENVIRITE + TRICIL HAVE DONE TESTING

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☒ NA



C. Management

## 1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

If yes, does notification contain the following?

(SEE ATTACHED)

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: ENVIRITE (ACID WASTE) TRICIL, HILLMAN, OH (ACID WASTE) CYANOCHEM, DETROIT, MICH SYSTECH (3-LOCATIONS, ALPENA, PAULDING, GREENCASTLE - F WASTE)

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☒ No

(ITEM WASTE MANAGEMENT)

SOLID RESOURCE RECOVERY, WEST CARROLLTON, OH (F-WASTE)

ROSS INCINERATOR, GRAFTON, OH (F-WASTE)

PAT-CHEM, WHITING, PA. (MELQUISH CEMENT) (F-WASTE)

Revised 11-03-87



If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☒ NA

**D. Treatment Using RCRA 264/265 Exempt Units or Processes**  
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

N/A



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☐ Yes ☒ No

If yes, check the appropriate regulatory status:

☐ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: OPERATIONALLY, THE FACILITY

WOULD NEVER STORE FOR MORE THAN 10 DAYS  
AT ANY TIME.

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☒ No

- C. Is the waste treated in an exempt treatment process on-site?

☒ Yes ☐ No





## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA

o California List ☒ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? 1984

b. Are analyses conducted on-site or off-site?

☒ On-site ☒ Off-site

Identify off-site lab: FOR OFF-SITE SHIPMENTS - WADSWORTH  
LAB IS SOMETIMES USED. THE ON-SITE LAB IS USED  
AS A MAJORITY TO IDENTIFY F-SOLVENTS.

c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: EVERY SHIPMENT CUMULATIVE  
IN A REPRESENTATIVE SAMPLE IS TAKEN.

e. Describe procedures used to identify manifest discrepancies:

RECEIVING INDIVIDUAL CHECKS MANIFEST FOR COMPLETION; SAMPLES  
ARE ANALYZED. ANY DISCREPANCY IS NOTED AND  
WASTES IS RETURNED WITH NOTED DISCREPANCY ON THE  
ORIGINAL MANIFEST.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No



B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

DRUMS ARE GIVEN A CODE TO IDENTIFY MANIFEST  
DOCUMENT NUMBER AND DRUMS ARE LABELED WITH  
A H.W. LABEL INDICATE WASTE TYPE & WHEN GENERATION  
STARTED BEGAN. OPERATING RECORDS FOR FACILITY WOULD INDICATE DATE  
AND DATES THAT THE WASTES ENTER AND LEAVE STORAGE? DRUM ENTERED  
STARTED.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No (WITHIN ONE WEEK)

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA (SOME HAS  
BEEN - CERO'S  
WASTE)

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☒ Yes ☐ NoIf yes, state how: ECONOMICS OF SHIPPING



7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes      ☐ No      ☐ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

RECORDS DOCUMENT CHANGES IN VOLUMES OF TANKS.

☒ Yes      ☐ No

NOT ACCUMULATING SOLID MATERIAL (WASTE).

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

FACILITY CAN IDENTIFY APPROX. 140 DRUMS OF WASTE THAT COULD HAVE GONE TO CELOS BUT ARE SCHEDULED FOR RESS.

☒ Yes      ☐ No      ☐ NA

TANK.

RECORD INVENTORY LEVEL ON A GIVEN DAY, AND  
INFORMATION CAN BE FOUND IN OPERATING RECORD.

### C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

☒ Yes      ☐ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

EXEMPTED RECYCLE PROCESS OR UNIT - DISTILLATION  
OF RECYCLED SOLVENTS.

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

☐ Yes      ☐ No

N/A

4. Describe frequency of testing treatment residuals:

N/A

5. Is dilution used as a substitute for treatment?

☐ Yes      ☐ No

N/A



6. Are notifications prepared by the generators kept in the facility's operating record? ☐ Yes ☐ No *N/A*

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☐ No ☒ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☒ No *N/A*

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements? ☐ Yes ☐ No *N/A*





3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No



- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site      \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

#### E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes      \_\_\_\_\_ ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_  
 \_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_  
 \_\_\_\_\_



4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA



RCRA LAND DISPOSAL RESTRICTION NOTIFICATION

ENVIRITE

Generator Name: HUKILL CHEMICAL CORPORATION EPA ID Number: OH0001926740  
Manifest Number: \_\_\_\_\_ Date of Shipment: \_\_\_\_\_  
EPA Hazardous Waste Number: D002

This notification is hereby submitted to Envirite Corporation in compliance with EPA regulations described in 40 CFR Part 268 which prohibit the land disposal of certain hazardous wastes, unless those wastes are treated to meet specified standards or treated using specified treatment technologies.

\*\*\*\*\*  
SECTION I

I have determined that the waste described on the above listed manifest is restricted in its present form and must be treated prior to land disposal.

Check One

- a. Liquid hazardous wastes containing free cyanide at concentrations greater than or equal to 1,000 mg/l.
- b. A liquid hazardous waste having a pH of less than 2.0. ✓
- c. A liquid hazardous waste containing the following metals in concentrations greater than the limits specified.

Arsenic	500 mg/l	_____	Mercury	20 mg/l	_____
Cadmium	100 mg/l	_____	Nickel	134 mg/l	_____
Chromium(VI)	500 mg/l	_____	Selenium	100 mg/l	_____
Lead	500 mg/l	_____	Thallium	130 mg/l	_____

Signature X \_\_\_\_\_ Title X \_\_\_\_\_

\*\*\*\*\*  
SECTION II

I have determined that the waste described on the above listed manifest has been treated in such a manner that it meets all of the limits described above. I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 266 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Signature \_\_\_\_\_ Title \_\_\_\_\_





# NOTIFICATION OF SHIPMENT OF A RESTRICTED WASTE MEETING TREATMENT STANDARDS

GENERATOR: HUKILL CHEMICAL CORPORATION

ADDRESS: 7013 Krick Rd., Bedford, Ohio 44146

MANIFEST #: \_\_\_\_\_

## I. Table GCWE - Constituent in Waste Extract 40 CFR 268.41

Concentration (in mg/l)	Wastewater Containing Spent Solvent	All Other Spent Solvent
FO01-FO03 Semi-Solvents	Solvents	Non-solvents
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.01
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and creylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

## FO20-FO23 and FO26-FO28 Wastes

	Concentration
HxCDD-A11 Hexachlorodibenzo-p-dioxins	<1 ppb
HxCDF-A11 Hexachlorodibenzofurans	<1 ppb
PeCDD-A11 Pentachlorodibenzo-p-dioxins	<1 ppb
PeCDF-A11 Pentachlorodibenzofurans	<1 ppb
TCDD-A11 Tetrachlorodibenzo-p-dioxins	<1 ppb
TCDF-A11 Tetrachlorodibenzofurans	<1 ppb
2,4,5-Trichlorophenol	<0.05 ppm
2,4,6-Trichlorophenol	<0.05 ppm
2,3,4,6-Tetrachlorophenol	<0.10 ppm
Pentachlorophenol	<0.01 ppm

## II. "California List" 40 CFR 268.32

- ☐ (1) Liquid hazardous wastes have a pH less than or equal to two (2.0).
- ☐ (2) Liquid hazardous wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm.
- ☐ (3) Liquid hazardous wastes that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1,000 mg/l and less than 10,000 mg/l HOCs.

## III. "California List" RCRA Section 3004(d)

- ☐ (A) Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing free cyanides at concentrations greater than or equal to 1,000 mg/l.
- ☐ (B) Liquid hazardous wastes, including free liquids associated with any solid or sludge, containing the following metal (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to those specified below:
- (i) arsenic and/or compounds (as As) 500 mg/l;
  - (ii) cadmium and/or compounds (as Cd) 100 mg/l;
  - (iii) chromium (VI and/or compounds (as Cr VI) 500 mg/l;
  - (iv) lead and/or compounds (as Pb) 500 mg/l;
  - (v) mercury and/or compounds (as Hg) 20 mg/l;
  - (vi) nickel and/or compounds (as Ni) 134 mg/l;
  - (vii) selenium and/or compounds (as Se) 100 mg/l; and
  - (viii) thallium and/or compounds (as Th) 130 mg/l.

The attached analysis shows that this waste meets or has been treated to the standard listed above.

## CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Authorized representative signature \_\_\_\_\_

Print or type name \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_



Date and Time of Inspection

Jul 10, 1984

11:45 a.m.

## RCRA INTERIM STATUS INSPECTION FORM

HNFAB # 02-18-0315

## PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD 001926740

Facility: Hukill Chemical Corp. Address: 7013 Krick Road City: Bedford  
State: Ohio Zip Code: 44146 County: Cuyahoga Telephone: 216-232-9400

## INSPECTION PARTICIPANTS(S)

(Name)

(Title)

(Telephone)

Robert HukillVice President, Gen. Mgr.216-232-9400David MartinProcess Engineer216-232-9400Robert LangProduction Supervisor216-232-9400

## INSPECTOR(S)

Kris L. CederEnvironmental Scientist216-425-9171David N. WertzEnvironmental Scientist, Supl.216-425-9171Ren LillichUSEPA312-886-6199

## INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)  
☐ Transporter (T)  
☐ TSDF only  
☐ G-T  
☐ G-TSDF  
☐ T-TSDF  
☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure  
☒ Containers S01  
☒ Tanks S02/T01  
☐ Surface Impoundments S04/T02  
☐ Incineration/Thermal Treatment  
☐ Waste Piles S03  
☐ Land Treatment D81  
☐ Landfills D80  
☐ Chemical/Physical/Biological T04  
☐ Groundwater Monitoring  
☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

Yes

No

N/A

R

✓

2. If "yes", is it complete and accurate?

✓

✓

*Changes b  
ins addre  
in Part B*

3. Has the facility submitted a Part B?

✓

✓

✓

REMARKS, PART 1, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A P

5. The generator meets the following hazardous waste pre-transport requirements:

- a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))
- b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).
- c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:

- a) The containers are clearly marked with the words "Hazardous Waste".
- b) The date that accumulation began is clearly marked on each container.

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).

9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).

Yes	No	N/A	P
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS





Part

## 4. GENERAL INTERIM STATUS REQUIREMENTS

## SUBPARTS INCLUDED

General Facility Standards  
Preparedness and PreventionD: Contingency and Emergency  
E: Manifest/Records/Reporting  
F: Groundwater monitoringG: Closure  
H: Financial RequirementsSubpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Areas subject to spills (i.e.; loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles; job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).			
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## RCRA INTERIM STATUS INSPECTION FORM

Yes	No	N/A	Remark #
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## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Report on File at Hukill.
-------------------------------------	--------------------------	--------------------------	---------------------------

2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)

a) Internal alarm system.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

b) Access to telephone, radio or other device for summoning emergency assistance.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

c) Portable fire control equipment.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained. (265.35)

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Limited aisle space in North sector of East Warehouse.
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6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
-------------------------------------	--------------------------	--------------------------	--

7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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## RCRA INTERIM STATUS INSPECTION FORM

Yes      No      N/A

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

Yes No N/A Remark #

## Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

Yes	No	N/A	Remark #
✓			
✓			
✓			
✓			
✓			
		✓	
✓			
✓			
		✓	
✓			

RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

✓                

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)

✓                

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))

                ✓

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))

                ✓

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.

                ✓

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

                ✓

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)

✓                

- a) A description of how and when the facility will be closed. (265.112(a)(1)).

✓

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark. #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ( NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart H: Financial Requirements

The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Blind Trust.</u>
b) A surety bond, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) A closure letter of credit, or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A combination of financial mechanisms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

E : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

Yes    No    N/A    R

1                  

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS



## PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) In good physical condition (265.171)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Compatible with the wastes stored in them (265.172)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



RCRA INTERIM STATUS INSPECTION FORMPART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
b) Were all of the notifications required by Section 263.30(c)(d) made?	___	___	✓	___
c) Was the discharge cleaned up as required by Section 263.31?	___	___	✓	___
9. Does the transporter store hazardous waste temporarily while they are in transit?	___	___	✓	___
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage (263.12).	___	___	✓	___

NOTE : TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

- |  |     |   |     |     |
|--|-----|---|-----|-----|
| 10. Does the transporter import hazardous waste into the United States?  | ___ | ✓ | ___ | ___ |
| 11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container? | ___ | ✓ | ___ | ___ |

NOTE : A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

- 1.1 The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).
- 2.2 Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).
- 3 Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).
- 4.4 Weekly inspections are made of all tank construction materials and containment structures (265.194).
- 5.5 Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a))
- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.
- 6.6 With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))
- a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>

RCRA INTERIM STATUS INSPECTION FORM

- 6  
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.
- 7  
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b))
- 8  
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)
- 9  
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>      </u>	<u>✓</u>	<u>      </u>
<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

4/1/83 and 5/16/83  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0315

U.S. EPA I.D. # OHD 001926740

PART 1. GENERAL INFORMATION

Facility: HUKILL CHEMICAL CORP. Address: 7013 KRICK ROAD City: BEDFORD  
State: OHIO Zip Code: 44146 County: CUYAHOGA Telephone: 216-232-9400

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert Hukill</u>	<u>Vice President, Gen. Mgr.</u>	<u>216-232-9400</u>
2.	<u>Bob Lang</u>	<u>Production Supervisor</u>	<u>216-232-9400</u>
3.			

INSPECTOR(S)

1.	<u>DAVID WERTZ</u>	<u>ENVIRON. SCIENTIST</u>	<u>216-425-9171</u>
2.	<u>MELINDA MERRYFIELD-BECKER</u>	<u>ENVIRON. SCIENTIST</u>	<u>216-425-9171</u>
3.	<u>TOM CARLISLE</u>	<u>ENVIRON SCIENTIST</u>	<u>614-462-8975</u>
4.	<u>MILTON RINEHART</u>	<u>ENVIRON SCIENTIST</u> <u>INSTALLATION ACTIVITY</u>	<u>614-466-1596</u>

Mark One

- ☐ Generator only (G)  
☐ Transporter (T)  
☐ TSDF only  
☐ G-T  
☐ G-TSDF  
☐ T-TSDF  
☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure  
☒ Containers S01  
☒ Tanks S02/T01  
☐ Surface Impoundments S04/T02  
☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03  
☐ Land Treatment D81  
☐ Landfills D80  
☐ Chemical/Physical/Biological T04  
☐ Groundwater Monitoring  
☐ Post-Closure





RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	—	—	—
<u>✓</u>	—	—	—
<u>✓</u>	—	—	—

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.



RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

5. The generator meets the following hazardous waste pre-transport requirements:

a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))

✓   —   —   —

b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).

✓   —   —   —

c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.

✓   —   —   —

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.

✓   —   —   —

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:

a) The containers are clearly marked with the words "Hazardous Waste".

—   —   ✓   —

b) The date that accumulation began is clearly marked on each container.

—   —   ✓   —

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).

✓   —   —   —

9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).

✓   —   —   —



RCRA INTERIM STATUS INSPECTION FORMPART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Section 262.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The transporter has signed the manifest as required by Section 263.20(b) and has carried the manifest with the waste shipment as required by 263.20(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	





RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Section 263.30(c)(d) made?	—	—	✓	—
c) Was the discharge cleaned up as required by Section 263.31?	—	—	✓	—
9. Does the transporter store hazardous waste temporarily while they are in transit?	—	—	✓	—
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage (263.12).	—	—	✓	—

NOTE : TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?

— ✓ — —

11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?

— ✓ — —

NOTE : A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS



# RCRA INTERIM STATUS INSPECTION FORM

## PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention

D: Contingency and Emergency  
E: Manifest/Records/Reporting

G: Closure  
H: Financial Requirements

### Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	#1
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>      </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
c) Portable fire control equipment.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>





RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident.
  - b) Arrangements or agreements with local or state emergency authorities.
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
  - d) A list of all emergency equipment including location, physical description and outline of capabilities.
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

✓	—	—	—
—	✓	—	#2
✓	—	—	—
—	✓	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
—	✓	—	#1 & #
—	—	✓	—
✓	—	—	—



# RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

Yes No N/A Remark #

✓ — — —

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)
- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))
- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

✓ — — —

— — ✓ —

— — ✓ —

— — ✓ —

— — ✓ —

## Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)
- a) A description of how and when the facility will be closed. (265.112(a)(1)).

✓ — — —

✓ — — —



RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. ( NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No plans to close
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) A surety bond, or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) A closure letter of credit, or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) A combination of financial mechanisms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.





RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS



# RCRA INTERIM STATUS INSPECTION FORM

## Subpart J: Storage in Tanks

Yes    No    N/A    Remark #

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).

✓    —    —    —

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).

—    —    ✓    —

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).

—    ✓    —    #3

4. Weekly inspections are made of all tank construction materials and containment structures (265.194).

✓    —    —    —

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a))

a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

—    —    ✓    —

b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

—    —    ✓    —

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a))

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).

—    ✓    —    —



# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers  
J: Management of Tanks  
K: Surface Impoundments

L: Waste Piles  
M: Land Treatment  
N: Landfills

O: Incinerators  
P: Thermal Treatment  
Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	—
b) In good physical condition (265.171)	✓	—	—	—
c) Compatible with the wastes stored in them (265.172)	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	—
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	—
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	—



RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	—	—	—
<u>✓</u>	—	—	—
<u>✓</u>	—	—	—
<u>✓</u>	—	—	—

- b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b))
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (265.199)
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).





## Huttil Chemical

#1 Although the loading area are used daily and are in an area of constant work activity, no formal log is kept. Noting the inspection of the area.

#2 An inventory of each storage area is now kept, but some of the required information about the waste is not on the current form used. The current method does include the customer identification and manifest numbers.

#3 Records are kept daily on the Tank Levels, but other information required by the daily inspection is not on the current inspection log.



## RCRA INTERIM STATUS INSPECTION FORM

## PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH D001926740

Facility: Hukill Chemical Corp. Address: 7013 Krick Road City: Bedford  
State: Ohio Zip Code: 44146 County: Cuyahoga Telephone: 216-232-9400  
Facility Operator: Hukill Chemical (Robert Hukill) Title: General Manager Telephone: 216-232-9400  
Facility Owner: Hukill Chemical Corporation Address: 7013 Krick Road  
City: Bedford State: Ohio Zip Code: 44146 Telephone: 216-232-9400  
Type of Ownership: X Private        Government State HWFAB No. 02-18-0315

Date of Inspection: 5-27-82 Time of Inspection: (Start) 2:00 (Finish)       

Advance Notification?        No X Yes:       

Weather Conditions: Sunny 80'S

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert T. Hukill</u>	<u>V. P. - General Manager</u>	<u>216-232-9400</u>
2.	<u>Emery Hukill</u>	<u>President</u>	<u>" "</u>
3.	<u>Kevin A. Lehner</u>	<u>J. J. Keller Assoc. Consultants</u>	<u>414-722-2848</u>
4.	<u>DAVID G. Marlin</u>	<u>Process Engineer</u>	<u>216-232-9400</u>
5.	<u>Bob Lang</u>	<u>Production Supervisor</u>	<u>216-232-9400</u>

# RCRA INTERIM STATUS INSPECTION FORM

## INSPECTOR(S)

(Name)

(Title)

(Telephone)

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment  
D. ☒ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F002, F003, F004, F005

b) Non-Listed Wastes: D001 I D002 C D003 R D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☒ Yes, See Remark # \_\_\_\_\_ ☐ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_

X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

X Yes, Complete Part 3. (Transp.)

\_\_\_\_\_ No

a) Applicable U.S. EPA I.D. Number DHD001926740

b) Ohio P.U.C.O. GR TRSF Number 304-HW

7. A brief description of site activity:

- Recycler of solvents
- Bulk terminal for acids

REMARKS, PART 1. (GENERAL INFORMATION)

# RCRA INTERIM STATUS INSPECTION FORM

## PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	—	—	✓	#1
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓	—	—	—
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓	—	—	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	✓	—	—	—
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	✓	—
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	—	—	✓	—
	—	—	✓	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	✓	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	✓	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	✓	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	✓	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	✓	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	—
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	—



RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>
9. Does the transporter store hazardous wastes temporarily while they are in transit?	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>      </u>
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>      </u>
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>      </u>

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

## REMARKS, PART 3. TRANSPORTER REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### SUBPARTS INCLUDED

B: General Facility Standards  
C: Preparedness and Prevention  
D: Contingency and Emergency

E: Manifest/Records/Reporting  
F: Ground Water Monitoring  
G: Closure

H: Financial Requirements

### Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>#2</u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>      </u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>      </u>
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>#3</u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>#4</u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(11) and 3745-55-14-B-2-b).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>#5</u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Inspect monitoring equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) Inspect security, alarm and communications devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Inspect process equipment (pipes, pumps, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Inspect containment structures (dikes, curbs, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g) Inspect hazardous waste handling/loading areas each day used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Record of any malfunctions due to equipment or operator errors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Record of any hazardous waste discharges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<u>—</u>	<u>✓</u>	<u>—</u>	<u>—</u>

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
a) Actions to be taken by personnel in the event of an emergency incident.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Arrangements or agreements with local or state emergency authorities.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

# RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>                          | <u>Remark #</u> |
|--|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.           | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |                 |

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- |   | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|--------------------------|-----------------|
| 1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| c) The estimated (or actual) weight, volume or density of the waste material(s).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2)?	—	—	✓	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	✓	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	✓	—

## Subpart F: Groundwater Monitoring

N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	<u>      </u>	<u>      </u>	<u>No plans to close.</u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u>      </u>	<u>      </u>	<u>✓</u>	<u>      </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Yes   No   N/A   Remark #

\_\_\_\_\_   \_\_\_\_\_   ✓   \_\_\_\_\_

Subpart II: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

✓   \_\_\_\_\_   \_\_\_\_\_   \_\_\_\_\_

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

### Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes   No   N/A   Remark #

✓   —   —   —

## Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

✓   —   —   —

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

—   —   ✓   —

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

✓   —   —   —

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

✓   —   —   —

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

—   —   ✓   —

- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

—   —   ✓   —

- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

—   —   ✓   —

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one <u>or</u> both of the following methods, (Sections 265.198(a) and 3745-56-78).	✓	—	—	—
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	—	✓	—	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓	—	—	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	✓	—	—	—
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	✓	—	—	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	✓	—	—	—

## Subpart K: Surface Impoundments

N/A

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	—	—	—	—
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	—	—	—	—



# RCRA Inspection Report

EPA Identification Number OH D001926740

HWFAB Permit Number (if appropriate) 02-18-0315

Facility Name Hukill Chemical Corporation

Location 7013 Krick Road  
Bedford, Ohio 44146

## Person(s) Interviewed

Robert t. Hukill

Emery Hukill

David G. Maslin

Bob Lang

Kevin A. Lehner

Inspector(s)

David Wentz

Title  
V. President Gen. mgr  
President

Process Engineer

Production Supervisor

J. J. Keller - Consultant  
Agency/Title

Telephone

216-232-9400

" " "

" " "

" " "

414-722-2848  
Telephone

Ohio EPA Environmental  
Scientist

216-425-9171

Ohio EPA

Ohio EPA

## Installation Activity

Mark One

- ☐ Generator only (G)
- ☐ Transporter only (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- ☐ Groundwater Monitoring
- ☒ Closure and Post-Closure
- ☐ Financial Requirements
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☒ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment T03
- ☐ Chemical/Physical/Biological T04

ISS Inspection Comments  
Hukill Chemical  
May 27, 1982

- #1 - Shipments are by bulk tanker.
- #2 - Pre-shipment analysis is required from the customer. The arrival load is also analyzed.
- #3 - The facility operates 24 hours a day, five days a week. A Honeywell security system operates in the building on weekends.
- #4 - The south or street frontage and the west side are not secured by an artificial or natural barrier. The north and east sides have natural barriers.
- #5 - There is controlled entry to the inside of the office building, but not to the outside storage area.

N/A

\* STATE IDENTIFICATION NUMBER  
(If Applicable)

OHDP#192674P  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Hukill Chemical Corporation
- (b) Street: 7013 Krick Rd.
- (C) City: Cleveland (D) State: Ohio (E) Zip Code: 44146
- (F) Phone: 216-232-9400 (G) County: Cuyahoga
- (H) Operator: Same as Above
- (I) Street: \_\_\_\_\_
- (J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_
- (M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_
- (U) Owner: Same as Above
- (P) Street: \_\_\_\_\_
- (Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_
- (T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_
- (V) Date of Inspection: April 29 (W) Time of Inspection (From) 4:00 (To) 5:30
- (X) Weather Conditions: year 7  
cold and rainy

Rev. 1-26-81/J.B.



Telephone

(216) 232-9400





(216) 835-4919

(216) 232-9400

Telephone

OEPA/Solid Waste Scientist (216) 425-9171

1000

Telephone

Agency/Title Telephone  
AFPA / Solid Waste Scientist (216) 425-9171

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

~~X~~ A. Storage and/or Treatment

## 1. Containers (I)

2. Tanks (J)

### 3. Surface Impoundments (K)

4. Waste Piles (L)

     D. Incineration and/or Thermal Treatment  
(O and P)

E. Chemical, Physical, and Biological Treatment (Q)

### B. Land Treatment (M)

C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.



III. GENERAL FACILITY STANDARDS:  
(Part 26b Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	_____	_____	_____
2. Facility expansion?	<u>N/A</u>	_____	_____	_____
(b) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	_____	_____	<u>1.</u>
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	<u>✓</u>	_____	_____	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	_____	_____	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	_____	_____	_____	<u>2</u>
2. Artificial or natural barrier around facility?	_____	_____	_____	<u>3</u>
3. Controlled entry?	_____	<u>✓</u>	_____	_____
4. Danger sign(s) at entrance?	<u>✓</u>	_____	_____	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	_____	<u>✓</u>	_____	_____
2. Records of operator error?	_____	<u>✓</u>	_____	_____
3. Records of discharges?	_____	<u>✓</u>	_____	_____

\*Not Inspected





### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>3</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	↓
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job Descriptions?	<u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of Training?	<u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of Training?	<u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<u>NA</u>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<u>NA</u>	<input type="checkbox"/>	<input type="checkbox"/>	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Not Inspected



IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

1. Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

      ✓       \_\_\_\_\_

(b) If required, does the Facility  
have the Following Equipment:

1. Internal communications or  
alarm systems?

      ✓       \_\_\_\_\_

2. Telephone or 2-way Radios  
at the scene of operations?

      ✓       \_\_\_\_\_

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

      ✓       \_\_\_\_\_

Indicate the volume of water and/or foam available for fire control:

Units: 25 ABC fire extinguishers, fire hydrant unlimited water  
supply, 3M light water foam

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the Owner or Operator  
established Testing and  
Maintenance Procedures  
for Emergency Equipment?

      ✓       \_\_\_\_\_

2. Is Emergency Equipment  
Maintained in Operable  
Conditions?

      ✓       \_\_\_\_\_

(D) Has Owner or Operator Provided  
Immediate Access to Internal Alarms?  
(if needed)

      ✓       \_\_\_\_\_



(1) Is there adequate aisle space  
for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel  
must take to comply with  
§265.51 and 265.56 in response  
to fires, explosions, or any  
unplanned release of hazardous  
waste? (If the owner has a Spill  
Prevention, Control, and Counter-  
measures (SPCC) Plan, he needs  
only to amend that plan to  
incorporate hazardous waste  
management provisions that are  
sufficient to comply with the  
requirements of this Part (as  
applicable.)

— — —

4/

2. Arrangements agreed to by local  
police departments, fire departments  
hospitals, contractors, and State  
and local emergency response teams  
to coordinate emergency services  
pursuant to §265.37?

✓

— — —

3. Names, addresses, and phone  
numbers (office and home) of all  
persons qualified to act as  
emergency coordinators?

✓

— — —

4. A list of all emergency equipment  
at the facility which includes the  
location and physical description  
of each item on the list and a  
brief outline of its capabilities?

✓

— — —

5. An evacuation plan for facility  
personnel where there is a possibility  
that evacuation could be necessary?  
(This plan must describe signal(s)  
to be used to begin evacuation,  
evacuation routes, and alternate  
evacuation routes?)

— ✓ —

4/



# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?	<input checked="" type="checkbox"/>			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input checked="" type="checkbox"/>			

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<input checked="" type="checkbox"/>			
2. Are records of past shipments retained for 3 years	<input checked="" type="checkbox"/>			
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<input checked="" type="checkbox"/>			





VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

6

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.)

NA

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the contingency plan?

5

g. All closure and past closure costs as applicable? (Effective 5-19-81)

NA

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



V.II. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	<u>NA</u>	___	___	_____
2. Has this plan been submitted to the Regional Administrator	<u>NA</u>	___	___	_____
3. Has Closure begun?	<u>NA</u>	___	___	_____
4. Is closure estimate available by May 19, 1981?	<u>NA</u>	___	___	_____
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<u>NA</u>	___	___	_____

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Hulkill Chemical Corp. Date of Inspection: 4/29/81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>✓</u>	___	___	_____
2. Are containers compatible with waste in them?	<u>✓</u>	___	___	_____
3. Are containers stored closed?	<u>✓</u>	___	___	_____
4. Are containers managed to prevent leaks?	<u>✓</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects?	<u>✓</u>	___	___	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	<u>✓</u>	___	___	_____

Indicate if waste is: ☐ Ignitable, ☐ Reactive



Yes	No	NI*	Remarks
-----	----	-----	---------

8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?

J  
TANKS

Date of Inspection: 4/29/61

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

NA

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

WA

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

Indicate if waste is: ☒ Ignitable  
☐ Reactive

-



8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? *yes - Fire Department has conducted numerous inspections. there are 35 tanks between*

Tank capacity: \_\_\_\_\_ gallons *10,000 and 15,000 gallon capacity.*

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

\_\_\_\_\_

2. Do earthen dikes have protective covers?

\_\_\_\_\_

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

\_\_\_\_\_

4. Is the freeboard level inspected at least daily?

\_\_\_\_\_

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

\_\_\_\_\_

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_





L  
WASTE PILES

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
<i>Indicate if waste is: <input type="checkbox"/> Ignitable, <input type="checkbox"/> Reactive</i>				
5. Are piles of reactive or ignitable waste protected?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____



## LAND TREATMENT

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Is hazardous waste <sup>trated</sup> capable of biological or chemical degradation? \_\_\_\_\_
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? \_\_\_\_\_
3. Is waste analyzed according to 265.273? \_\_\_\_\_
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? \_\_\_\_\_
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? \_\_\_\_\_
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? \_\_\_\_\_
7. *Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility?* \_\_\_\_\_
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? *Indicate if waste is: ☐ Ignitable ☐ Reactive* \_\_\_\_\_
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) \_\_\_\_\_



N  
LANDFILLS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
<b>(A) General Operating Requirements</b>				
Does the facility provide the following:				
**1. Diversion of run-on <sup>off</sup> away from active portions of the fill?	_____	_____	_____	_____
**2. Collection of run-off from active portions of the fill?	_____	_____	_____	_____
**3. Is collected run off treated?	_____	_____	_____	_____
4. Control of wind disposal of hazardous waste?	_____	_____	_____	_____
(**Effective 11-19-81)				
<b>(B) Surveying and Recordkeeping</b>				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	_____	_____	_____	_____
<b>(C) Closure and Post-Closure</b>				
1. Is the Closure Plan available for inspection by 5-19-81?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
3. Has Closure begun?	_____	_____	_____	_____
4. Is Closure cost estimate available by 5-19-81?	_____	_____	_____	_____
<b>(D) Special requirements <sup>for</sup> ignitable or reactive waste</b>				
Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?				



	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are <sup>✓</sup> liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____





O and P  
INCINERATION and THERMAL TREATMENT

(A) Facility Name: \_\_\_\_\_

(B) Date of Inspection: \_\_\_\_\_

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

B. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____



2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead?

\_\_\_\_

b. Mercury?

\_\_\_\_

- B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

Remarks

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

4. \_\_\_\_\_

5. \_\_\_\_\_

### III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Combustion/emission control instruments monitored at least every 15 minutes	____	____	____	_____
B. Steady state maintained or corrections attempted?	____	____	____	_____
C. Stack Plume observed at least hourly for normal color and opacity?	____	____	____	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	____	____	____	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	____	____	____	_____
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	____	____	____	_____
G. Emergency shutdown controls, system alarms checked daily for proper operation?	____	____	____	_____

\*Not Inspected

\*\*Specify in Remarks for what period of time this was checked.



#### IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

Yes   No   NI\*   Remarks

1. Does this facility burn only waste explosives?  
(A No answer means other hazardous waste is open-burned.)

\_\_\_\_\_

2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

\_\_\_\_\_

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

#### Q CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

yes   No   NI\*   Remarks

1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?

\_\_\_\_\_

2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)

\_\_\_\_\_



Yes No NI\* Remarks

3. Has the owner or operator addressed the waste analysis requirements of 265.402?

\_\_\_\_\_

4. Are inspection procedures followed according to 265.403?

\_\_\_\_\_

5. Are the special requirements fulfilled for ignitable or reactive wastes?

\_\_\_\_\_

6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)

\_\_\_\_\_

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

Yes No NI\* Remarks

(A) Does the operator have copies of the Manifest available for review?

☒ \_\_\_\_\_

(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)

1. Manifest document number?

☒ \_\_\_\_\_

2. Name, mailing address, telephone number, and EPA ID Number of Generator

☒ \_\_\_\_\_





	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>✓</u>	___	___	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>✓</u>	___	___	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>✓</u>	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>✓</u>	___	___	_____
7. Required Certification?	<u>✓</u>	___	___	_____
8. Required Signatures?	<u>✓</u>	___	___	_____
(C) Does the Owner or Operator Submit Exception Reports when Needed?	<u>✓</u>	___	___	_____

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	<u>✓</u>	___	___	_____
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	<u>✓</u>	___	___	_____
(C) If required, are placards available to transfer?	<u>✓</u>	___	___	_____



Omit Section 3 if the facility has interim status and if Part A permit application describes storage *NA - Site is a storage facility*

### 3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	-------------------------------------	--------------------------	--

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste NA has a generator:
  - a. Notified the Administrator in writing? WA ~~MMB~~
  - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? NA ~~MMB~~
  - c. Met the Manifest requirements? NA ~~MMB~~
2. Importing Hazardous Waste, has the generator:
  - a. Met the manifest requirements? ☐ ☐ ☐



## X

Complete this Section if the owner or operator transports hazardous waste.

## I. MANIFEST SYSTEM AND RECORDKEEPING

Yes	No	NI*	Remarks
-----	----	-----	---------

- (A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

## II. INTERNATIONAL SHIPMENTS *with*

- A. Does the Transporter record on the manifest the date the waste left the U.S.?

- B. Are signed completed manifest(s) on file?

## V. MISCELLANEOUS

- A. Does Transporter transport hazardous waste into the U.S. from abroad

- B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected





## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

This facility redeems spent solvents. In the past they were considered a generator of hazardous wastes due to their still bottoms. Recently, they have incorporated their still bottoms into a supplemented fuel which they are marketing. Thus, they may not even be considered a generator at present. However, Hukill Chemical is a storage facility.

